

DEPT OF TRANSPORTATION  
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November 6, 2000

Docket Facility  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington DC 20590-0001


Re: Notice and Request for Comments  
Docket No. RSPA-98-4957 Notice 22-23 - 35  
65 Fed. Reg. 54336, September 7, 2000

Dear Sir or Madam:

Please find enclosed an original and a copy of the American Gas Association's comments on the referenced Federal Register notice. AGA appreciates the opportunity to comment on this proposal.

If you should have any questions, please feel free to telephone me at 202-824-7339.

Respectfully submitted,

By:   
Philip W. Bennett  
Senior Counsel and Director  
American Gas Association

**BEFORE THE  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
UNITED STATES DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

<b>Request for Comments on the</b>	)	<b>Docket No. RSPA-98-4957</b>
<b>Extension of Existing Information</b>	)	<b>Notice 22</b>
<b>Collection</b>	)	<b>September 7, 2000</b>

**Comments of the American Gas Association on the  
Information Collection for the National Pipeline Mapping System**

The American Gas Association (AGA) is a trade association representing more than 180 gas utilities in the United States, which together distribute more than 90 percent of the natural gas delivered in this country. Our U.S. members are regulated by the U.S. Department of Transportation's (DOT) Research and Special Programs Administration (RSPA) and the states for the safe design, construction, operation and maintenance of pipeline systems. In addition, AGA collects, analyzes and disseminates information and data on the natural gas industry, promotes the safe and efficient delivery and use of energy, and serves as a national voice for the gas utility industry.

AGA appreciates the opportunity to provide comments. AGA has been instrumental in bringing gas utilities together with representatives of the Department of Transportation to help companies understand the technical aspects of the voluntary mapping initiative. AGA helped sponsor a workshop in June 2000, in Washington D.C., to discuss the technical requirements and objectives of the National Pipeline Mapping System (NPMS).

As AGA members learn more details about the NPMS, they have determined that the burden to submit maps in the required format is substantially more than the 20 hours estimated in Federal Register notice, 65 Fed. Reg. 54336, September 7, 2000. AGA has surveyed operators who attended the June workshop, and therefore knowledgeable about what is needed for the NPMS. The estimated workloads to complete the work ranged from 8 hours to 5,200 hours for the initial submittal of maps.

We do not know what was the basis for RSPA's estimate that the initial submittal would average 20 hours per operator. AGA does know that much of the earlier work done on the development of an NPMS was with interstate natural gas transmission and liquid pipeline operators. These transmission pipelines are substantially different from the transmission pipelines operated by local distribution companies. In the case of liquid operators, the transmission lines often start at a crude product terminal and travel a thousand miles on a right-of-way to reach a refinery. There are few, if any, laterals that provide intermediate delivery points. Interstate natural gas transmission lines often operate in much the same fashion, by transporting natural gas from reservoirs in the Gulf Coast or Rocky Mountains to the Midwest and Eastern United States.

Conversely, LDC transmission lines serve as the last segment of the national gas delivery system. A few miles of LDC transmission pipe can have transmission laterals that deliver gas to dozens of customers. The LDC transmission lines have many more laterals, many more customers, and are documented on many more maps. AGA believes that there is more cost involved in submitting maps for LDCs as compared to those for operators of liquid and interstate natural gas transmission pipelines. RSPA should therefore reevaluate the mapping information request and the burden it places on operators.

#### Practical Utility of the Information

The Federal Register request asked for comments on the practical utility of the information requested. AGA and its member companies are committed to working with state and federal agencies to manage what is one of American's safest modes of transportation. The Department of Transportation has implemented a system where the state agencies have been delegated authority from the Department of Transportation for the safety oversight of LDCs. When state agencies seek maps regarding all or a specific portion of an intrastate pipeline, they are provided with the information. Operators will also provide maps in their existing format to the Department of Transportation upon request. Operators see little practical utility in submitting information on all transmission segments just in case the information may be used in the future.

#### Ways to Minimize the Burden of Collection

AGA commends OPS for establishing a NPMS submission system that allows operators to submit digital maps or paper maps in a specific format that can be converted into digital maps by OPS. Operators that have already converted their engineering maps to a digital system can comply with the mapping request with minimal effort. Technologies for graphic information system have yet to be adopted by many operators. Therefore, OPS should consider a gradual approach to implementing the NPMS system that allows operators that are still using paper maps to implement the technology necessary to convert their maps to the digital format, instead of reformatting their paper maps specifically for submission to the NPMS.

OPS should also reevaluate whether all transmission lines should be in the NPMS system. The Code of the Federal Register defines a transmission line as:

Transmission line means a pipeline, other than a gathering line, that: (a) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center; (b) Operates at a hoop stress of 20 percent or more of SMYS; or (c) Transports gas within a storage field. A large volume customer may receive similar volumes of gas as a distribution center, and includes factories, power plants, and institutional users of gas.

Because of the definition of a transmission line, the LDC operators would under the NPMS initiative as it is written submit maps for small diameter lines whose hoop stress is greater than 20% SYMS. The laterals that serve many factories, power plants, and other industrial users would be mapped. AGA believes the intent of the original initiative

was to map the major arteries of the nation's energy transportation system, rather than mapping small diameter transmission laterals to factories.

OPS may desire to limit the initial request to large diameter transmission lines. LDC pipelines twenty-four (24) inches or greater would be similar to interstate transmission lines. LDC operators will probably still have to submit more maps than interstate operators crossing rural or desert landscapes. However, this prioritized approach would reduce the burden, likely increase participation, and increase the speed of map submission.

Enhance the Clarity, Quality, And Utility of the Information Collected

If the maps from LDC operators are limited to large diameter pipes the clarity, quality, and utility of the information may be enhanced. Too much information adds to confusion. Small diameter transmission laterals in the NPMS would not add to the analysis of the maps. Additionally, since the pipe diameter is not on existing information submitted to the NPMS, persons evaluating the information would not be able to distinguish between different size pipe. The important element for the NPMS is the location of large diameter pipe. AGA believes that limiting the submission of maps to pipes above a certain diameter would add clarity and utility to the NPMS.

Again, AGA appreciates the opportunity to submit comments. If you have questions or need additional information please feel free to contact Philip Bennett or me.

Respectfully submitted,

THE AMERICAN GAS ASSOCIATION  
November 6, 2000

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